

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REBECCA BROWN and AUGUST)	
TERRENCE ROLIN, on behalf of themselves)	
and all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	CASE NO. 2:20-cv-00064-LPL
)	
TRANSPORTATION SECURITY)	
ADMINISTRATION; DAVID P. PEKOSKE,)	
Administrator, Transportation Security)	
Administration, in his official capacity; DRUG)	
ENFORCEMENT ADMINISTRATION; UTTAM)	
DHILLON, Acting Administrator, Drug)	
Enforcement Administration, in his official)	
Capacity; “STEVE” LAST NAME UNKNOWN,)	
Agent, Drug Enforcement Administration, in his)	
individual capacity; and UNITED STATES OF)	
AMERICA,)	
)	
Defendants.)	
)	

THE GOVERNMENT DEFENDANTS’ MOTION TO DISMISS

Defendants Transportation Security Administration; David P. Pekoske, Administrator, Transportation Security Administration, in his official capacity; Drug Enforcement Administration; Uttam Dhillon, Acting Administrator, Drug Enforcement Administration, in his official capacity; and the United States of America (collectively, “the Government Defendants”) move to dismiss the claims brought against them by Plaintiffs Rebecca Brown and August Terrence Rolin pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure.

The grounds for this motion are set forth more fully in the accompanying memorandum in support of this motion. A proposed order is attached.

Dated: May 29, 2020

Respectfully submitted,

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/s/ Elizabeth Tulis
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